

UNITED STATES DISTRICT COURT  
District of South Carolina  
Columbia Division

Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge,

Plaintiffs,

vs.

Seneca Specialty Insurance Company,

Defendant.

C/A No.: 3:13-cv-03161-TLW

**PLAINTIFFS' RULE 26(a)(3) PRETRIAL  
DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(3), Plaintiffs Vagish, LLC, doing business as Cambridge Plaza Hotel, and Va Va Vagish, LLC, doing business as Legends Lounge, hereby submit the following pretrial disclosures:

**1. The name and, if not previously provided, the address and telephone number of each witness separately identifying those whom the party expects to present and those whom the party may call if the need arises.**

RESPONSE: Please see the chart below.

	WITNESS	EXPECT TO CALL	MAY CALL
1	Angie Anderson		X
2	Denise Arnold		X
3	Brian Bisema		X
4	Heidi Michelle Bland	X	
5	Bernard Carson		X
6	Brandi Farris		X
7	Steven Forseburg		X
8	Mike Gibson		X
9	Matthew Hick		X
10	Joie Jackson		X
11	Tim Jones		X

12	Dana Kaminer	X	
13	Brad Keller	X	
14	Maurice Kraut, Plaintiffs Expert	X	
15	Dr. Rakesh Kumar	X	
16	Bryant McGowan	X	
17	Steven Ouzts		X
18	Lilaben Patel		X
19	Ramanlal Patel		X
20	Shilpa Ben Patel		X
21	Steve Piano		X
22	Suzanne Pucci	X	
23	Priscilla Rish		X
24	Keesha Ruffin		X
25	Stan Sanders	X	
26	AJ Shah	X	
27	Philip Simoneaux, Plaintiffs Expert	X	
28	Arunima Sinha	X	
29	Dr. Kaushal Sinha		X
30	Kislaya Sinha	X	
31	Tom Slovenski, Plaintiffs Expert	X	
32	Prem Sonekar	X	
33	Becky Sturkie		X
34	Stan Townsend	X	
35	Dawn Watson		X
36	Sydnee Wilson		
37	Julie Weiswasser		X

Plaintiffs reserve the right to call any witnesses Defendant identifies or expects to call for the trial of this case, or witnesses called as rebuttal witnesses or as witnesses for impeachment purposes.

**2. The designation of those witnesses whose testimony is expected to be presented by means of a deposition and if not taken stenographically, a transcript of the pertinent portions of the deposition.**

RESPONSE: Plaintiffs may introduce the entire deposition transcript testimony of the following witnesses, if they are unavailable for trial:

- a. Deposition of AJ Shah, Oct 20, 2015

b. Deposition of Heidi Michelle Bland, Nov 4, 2015

c. Deposition of Stephen Piano, Jan 14, 2016

Further, Plaintiffs may introduce the entire deposition transcript testimony and synchronized video of the following witnesses, if the following individuals are unavailable for trial:

d. Deposition of Stephen Sollecito, Apr 30, 2015

e. Deposition of Gregory Crapanzano as the 30(b)(6) designee of Seneca, May 1, 2015

**3. An appropriate identification of each document or other exhibit, including summaries of other evidence, separately identifying those which the party expect to offer and those which the party may offer if the need arises.**

RESPONSE: Please see the chart below.

NO	DOC. ID	DESCRIPTION	EXPECT TO OFFER	MAY OFFER
1	PL_000002-000005	Email string between Tuley with Rimkus and Sinha, Jun 18, 2013 re: Inspection		X
2	PL_000009-000021	Email string between McGowan and Sinha, Jun 18, 2013 re: Fire of 6/14/13 file #201259365712, claim number 13FFN155	X	
3	PL_000022-000023	Email string between McGowan and Sinha, Jun 24, 2013 re: Cambridge Plaza Hotel Clean up Begins Today	X	
4	PL_000024-000025	Email string between McGowan and Sinha, Jun 24, 2013 re: Cambridge Plaza Hotel Clm# 13FFN155	X	
5	PL_000029	Cambridge Fire Camera Log	X	
6	PL_000037	Shipjack receipt		X
7	PL_000041-000054	Email string between Cicodicola and Sinha, Jun 26, 2013 re: Vagish LLC Cambridge Plaza – 13FFN155 D/L 6/14/2013		X
8	PL_000066-000068	Incident Report/Fire Report from County of Lexington	X	
9	PL_000073-000075	Vagish LLC Business Income Claim, 9/18/2013	X	
10	PL_000076-000077	Email from Simoneaux to Sinha re: Business Income Claim Worksheet (monthly lost business income), Jul 26, 2013	X	

11	PL_000078-000080	Email from Sinha to Jones with Palmetto Design Associates re: Cambridge Construction Cost Estimate, Aug 12, 2013	X	
12	PL_000081-000082	Email from Sinha to Jones with Palmetto Design Associates re: Cambridge Construction Cost Estimate, Aug 12, 2013	X	
13	PL_000083-000085	Email from Sinha to Shah, attorneys and Jones, Aug 7, 2013 re: Proof of Loss Form	X	
14	PL_000088_000089	Email from Shah to Sinha, Aug 13, 2013 re: BPP (Business Persona Property limits)	X	
15	PL_000093	Email from Simoneaux to Wilson, Sep 6, 2013	X	
16	PL_000107-000129	Vagish PowerPoint Presentation Proposal to Super 8		X
17	PL_000130	Email from Sinha to Sanders, Jan 15, 2013	X	
18	PL_000147-000153	Property Improvement Plan, Feb 7, 2013		X
19	PL_000171-000173	Email from Sinha to Forsberg, Mar 21, 2013 re: License Agreement		X
20	PL_000231-000234	Email from Edwards to Sinha, Jun 9, 2013 re: Pre-Opening Integration Visit		X
21	PL_000235_000237	Email from Sinha to Sanders, Jun 27, 2013 re: Borrower Contact Info	X	
22	PL_000327-000332	Email from Sinha to Farris, Apr 24, 2013 re: Investor Update Letter	X	
23	PL_000333-000337	Notes re: Meeting with Rakesh Uncle and Sita Auntie, Jun 8, 2013	X	
24	PL_000338-000340	Email from Sinha to Kumar, Jun 10, 2013 re: Loan approval	X	
25	PL_000348-000358	Text string between Wilson and Sinha, Jun 1 - Jun 17, 2013		X
26	PL_000359	Real Estate Development Associate listing		X
27	PL_000360	Memo to Staff, May 23, 2013	X	
28	PL_000361-000363	Email from Sinha to Wilson and White, Jun 5, 2013 re: Update List of Current Issues		X
29	PL_000364	Email from Sinha to White, Jun 15, 2013 re: Priscilla Rish		X
30	PL_00387-000401	Fire damage FF&E inventory	X	
31	PL_00514-00518	Third-Party Agreement	X	
32	PL_000892-000904	Town Council Super 8 PowerPoint Presentation, Feb 6, 2013		X
33	PL_000915-000916	Email from Sinha to Williamson, Jun 10, 2013 re: deal in principle	X	
34	PL_000917-000927	Text string, Sinha and Shah, May 4 - Jul 8, 2013		X
35	PL_000929	Email from Wilson to Sinha, July 23, 2013 re: Approved Transaction (Stanley Steamer receipt)		X
36	PL_000938-000939	Email from Grochmal with EcoGreenHotel to		X

		Sinha re: Checking in, Aug 5, 2013		
37	PL_000942-000944	Email between Simoneaux and Sinha, Aug 21, 2013 re: Vagish, LLC Cambridge Plaza 13FFN155 D/L 6/14/2013		X
38	PL_000974-000975	Email from Sinha to Shah, Nov 11, 2013 re: Vagish Insurance Renewal 2013–Revenue Projections		X
39	PL_000976-000977	Email from Sinha to Shah, Nov 12, 2013 re: Limits		X
40	PL_000978-000979	Email from Sinha to Shah, Jul 11, 2013 re: Updated to Cambridge		X
41	PL_000980-000983	Email between Simoneaux and Sinha, Nov 11, 2013 re: Vagish LLC Cambridge Plaza – 13FFN155 D/L 6/14/13		X
42	PL_001031-001052	Email between Sinha, Simoneaux and Attorneys re: Vagish LLC Cambridge Plaza – 13FFN155 D/L 6/14/2013, July 24, 2013 <b>Redactions</b>		X
43	PL_001078-001083	Texts between Sinha and Jones, Jun 14–Nov 26, 2013		X
44	PL_001112-001113	Email between Sinha and Bishop, Jan 6, 2014 re: Property visit		X
45	PL_001181	Access Point application sent to Sinha, Mar 26, 2013		X
46	PL_001182	Email from Siddons to Sinha, Mar 26, 2013 re: Super 8 Update <b>Redactions</b>		X
47	PL_001183-001195	Email between Sanders, Forsberg and Sinha, Mar 27, 2013 re: Per our Conversation		X
48	PL_001196	Certificate of Insurance	X	
49	PL_001203-001205	Email between Patel and Sinha, Apr 10 2012 re: Architects		X
50	PL_001210-001211	Siddons Promissory Note		X
51	PL_001219	Email from Sinha to Patel, May 6, 2013 re: Loan Application		X
52	PL_001220-00235	Email from Sinha to Patel, May 6, 2013 re: Credit Application: Super 8 – Columbia Airport		X
53	PL_001236-001237	Email between Patel and Sinha, May 9, 2013 re: Super 8 – Columbia: Phase 1 (2011)		X
54	PL_001239-001252	Access Point proposal edits		X
55	PL_001253-001257	Sinha PFS, Nov 2012		X
56	PL_001262-001266	Email from Sinha to Patel, Jun 5, 2013 re: Revised Proposal		X
57	PL_001267	Email from Sinha to Patel, June 6, 2013 re: Clarification of scope of work		X
58	PL_001268	Executed term sheet	X	

59	PL_001310-001345	Email to Hick from Sinha, Jun 21, 2103 re: Underwriting documents		X
60	PL_001346-001352	Mortgage payoff statement		X
61	PL_001356-001358	Email to Hick from Sinha, Jun 25, 2013 re: Uses and Sources		X
62	PL_001405-001412	Email between Hick and Sinha, Jun 27, 2013 re: Cash Verification		X
63	PL_001519-001522	Email between Hick and Sinha, Jul 12, 2013 re: Super 8 Columbia – Certificate of Insurance and Summary <b>Redaction</b>		X
64	PL_001557	Email between Petigara and Sinha, Jul 23, 2013 re: Loan Closing <b>Redactions</b>		X
65	PL_001641-001644	Email from Siddons Law to Sinha and Arnold, Aug 21, 2013 re: Vagish mortgage satisfaction		X
66	PL_001654-001657	Email from Hick to Sinha and Arnold, Oct 4, 2013 re: Comfort Letter Request from Wyndham		X
65	PL_001701-001702	Email from Hick to Sinha, Jun 19, 2013 re: Underwriting Information Request – Super 8		X
66	PL_001718-001724	Email from Wilson to Sinha, Dec 2, 2013 re: Delivery & Acceptance Certifications		X
67	PL_001763-001764	Email from Angie Anderson with Palmetto Design Associates to Sinha, Dec 18, 2013		X
68	PL_001831-001875	Email between Petigara and Sinha, Mar 13, 2014 re: Super 9 Columbia – Appointment Request		X
69	PL_001896	Email from Sinha to Bisema, Mar 24, 2014 re: Super 8 (West Columbia, SC) – (4) Super 8 Flag and Franchise Agreement		X
70	PL_001897	Email from Sinha to Bisema, Mar 24, 2014 re: Super 8 (West Columbia, SC) – (10) Roadway and Access Plan		X
71	PL_001899-001901	Email from Sinha to Bisema, Mar 25, 2014 re: Super 8 (West Columbia, SC) – (8) PIP Requirements and Finish Selections		X
72	PL_001904-001911	Email from Petigara to Sinha and Hick, Mar 27, 2014 re: West Columbia, SC – Proposed Super 8 Valuation Tables and STR		X
73	PL_001919-001922	Email from Harpootlian Law to Hick, Apr 16, 2014 re: Vagish, LLC d/b/a Cambridge Plaza Hotel v. Seneca Specialty Insurance Company		X
74	PL_002029-002031	Email between Hick and Sinha, Mar 27, 2014 re: Information Request		X
75	PL_002050-002051	Email between Keller and Sinha, Jun 18, 2013 re: Cambridge Plaza Hotel – Kislaya Sinha contact info		X

76	PL_002052-002058	Email between Keller and Sinha, Jul 9, 2013 re: Cambridge Plaza Fire – Requested Documents		X
77	PL_002059-002095	Email between Brad Keller with SLED and Sinha re: Tarak Walter Unemployment Documents, Jul 21, 2013	X	
78	PL_002096-002098	Email from Sinha to Heidi Michelle Bland re: 1-8-2013 Plan, Jan 8, 2013		X
79	PL_002099-002101	Email from Patel to Sinha, Jan 10, 2013 re: Furniture Package		X
80	PL_002102-002105	Email from Woodwyk to Bland, Jan 13, 2013 re: Cambridge Subcontractors		X
81	PL_002106-002107	Email from Patel to Sinha, Jan 14, 2013 re: Old Window Units		X
82	PL_002112-002113	Email from Patel to Sinha, Jan 14, 2013 re: 12 rooms or more		X
83	PL_002122	Email from Funderburk to Sinha, Mar 4, 2013 re: furniture		X
84	PL_002123-002126	Email from Patel to Sinha, Jun 3, 2013 re: Invoice for Furniture		X
85	PL_002151-002155	Email between Sanders and Sinha, Apr 18, 2013 re: West Columbia		X
86	PL_002190-002191	Email from Patel to Sinha, May 27, 2013 re: Lobby		X
87	PL_002194-002199	Email from Patel to Sinha, May 14, 2013 re: Cambridge		X
88	PL_002224-002226	Email from Yankowitz to Sinha, Jun 13, 2013 re: Otis Elevator Company		X
89	PL_002227	Email from Sinha to Jones with Palmetto Design Associates, Jun 20, 2013 re: Deduction from Budget for Non-Construction Expense (FF&E)		X
90	PL_002230	Email from Sinha to Jones with Palmetto Design Associates, Oct 7, 2013 re: Update on Budget		X
91	PL_002251-002254	Email between Patel, Jones and Sinha, Nov 6, 2013 re: Super 8 Update Delays due to drawings		X
92	PL_002296-002300	Email between Patel and Sinha, Dec 13, 2013 re: Project Drawings		X
93	PL_002472-002476	Email between Barton with Town of Springdale and Sinha, Mar 25, 2013 re: Sign		X
94	PL_002501-002502	Email from Sturkie to Sinha, Jul 26, 2013 re: Cambridge Plaza Hotel		X
95	PL_002507	Email from Sinha to White and Wilson, Jun 13, 2013 re: Sparrow reduced in shift		X
96	PL_002508-002509	Statement of Jackson to Sinha, Jul 3, 2013	X	
97	PL_002510-002529	Sparrow Unemployment Response letter and submissions to the SC Unemployment Commission, Jul 4, 2013		X

98	PL_002684-002690	Property Improvement Plan Report – Conversion to Super 8, Feb 7, 2013 and revised Mar 6, 2013	X	
99	PL_002691-002697	Property Improvement Plan Report – Conversion to Super 8, Feb 7, 2013	X	
100	PL_002698-002803	Proposal for Super 8 presentation on Jan 2, 2013		X
101	PL_002804	Voicemail from Misty re: Stewart Clare W-2		X
102	PL_002805-002819	Super 8 Presentation made to Springdale Town Council, May 6, 2014		X
103	PL_002820-002844	Super 8 Presentation made to Springdale, SC , Feb 5, 2013		X
104	PL_002845-002847	Security Proposal to the Town of Springdale for inclusion in business license provided with 1 <sup>st</sup> notification of Super 8 brand negotiations		X
105	PL_002848	Ltr from Sinha to Barton, Dec 19, 2012 re: Discontinue services of Hawkeye Security		X
106	PL_002852-002964	Phase 1 Environmental Site Assessment for Cambridge Hotel – Pre-closing, Oct 26, 2011		X
107	PL_002965-002967	Access Point loan proposal	X	
108	PL_002968	Wire Transfer Order to Access Point Financial	X	
109	PL_002969-002983	Access Point Credit Application for Hospitality Equipment Financing		X
110	PL_002984	Vagish LLC Certificate of Existence		X
111	PL_002985	Vagish LLC Notice of Change of Designated Office and Agent of Service of Process		X
112	PL_002986-002987	Vagish LLC Articles of Incorporation	X	
113	PL_002988	Vagish LLC amended and restated Operating Agreement		X
114	PL_003019-003024	Vagish Membership Subscription Agreement		X
115	PL_003023-003024	IRS Employer ID number for Vagish, LLC		X
116	PL_003025-003065	Franchise Agreement, Mar 29, 2013	X	
117	PL_003075-003106	2010 Tax Returns for Kaushal and Arunima Sinha		X
118	PL_003107-003159	2011 Tax Returns for Kaushal and Arunima Sinha		X
119	PL_003160-003161	Siddons Promissory Note, Jan 10, 2012		X
120	PL_003162-003168	Mortgage Note		X
121	PL_003169	Operating Summary as of Jun 13, 2013		X
122	PL_003170	Kislaya Sinha Statement of Financial Condition, May 31, 2013		X
123	PL_003171-003198	Personal Financial State for Kaushal and Arunima Sinha, Apr 30, 2013		X
124	PL_003199	Certificate of Existence for Va Va Vagish, LLC		X
125	PL_003200-003209	Articles of Incorporation for Va Va Vagish, LLC		X
126	PL_003201	Operating Agreement for Va Va Vagish LLC		X
127	PL_003210-003213	Va Va Vagish LLC Membership Certificate and		X



		roll		
128	PL_003214-003224	Lease Agreement between Vagish LLC and Va Va Vagish LLC		X
129	PL_003225	IRS Employer ID for Va Va Vagish LLC		X
130	PL_003226-003227	Microtel balance sheet as of Dec 31, 2011		X
131	PL_003228-003229	Microtel profit and loss from Jan through Dec 2011		X
132	PL_003230-003231	Va Va Vagish dba Legends balance sheet, Dec 31, 2012		X
133	PL_003232-003233	Va Va Vagish dba Legends profit and loss for Jan – Dec 2012		X
134	PL_003234-003238	Super 8 Property sources & uses for 2011 and 2012		X
135	PL_003239-003241	Statistics Report for Dec 31, 2010, 2011 & 2012		X
136	PL_003242-003243	Microtel balance sheet as of Dec 31, 2012		X
137	PL_003244-003246	Microtel profit & loss from Jan – Dec 2012		X
138	PL_003248-003284	Access Point request budget and construction plan		X
139	PL_003285-003288	Ltr to Matthew Hick, Apr 15, 2014 and April 16, 2014 re: Status		X
140	PL_003289	Refinancing plan		X
141	PL_003292-003293	Access Point Closing Statement loan modification	X	
142	PL_003382-003383	Proof of Additional Equity – 2013 and 2014 shareholder contributions		X
143	PL_003384-003417	Proof of Additional Equity – Shareholder deposit check images for 2013 and 2014		X
144	PL_003418-003424	APF Loan Increase Loan Docs Apr 2014 - Access Point Opinion letter form		X
145	PL_003425-003433	APF Loan Increase Loan Docs Apr 2014 – Assignment of Lease		X
146	PL_003434-003444	APF Loan Increase Loan Docs Apr 2014 – Environmental Indemnity		X
147	PL_003445-003450	APF Loan Increase Loan Docs Apr 2014 – Fixture filing		X
148	PL_003451-003455	APF Loan Increase Loan Docs Apr 2014 – Guaranty Agreement		X
149	PL_003445-003450	APF Loan Increase Loan Docs Apr 2014 – Fixture filing		X
150	PL_003451-003455	APF Loan Increase Loan Docs Apr 2014 – Guaranty Agreement		X
151	PL_003456-003465	APF Loan Increase Loan Docs Apr 2014 – Intercreditor Agreement and Certificate for loan modification		X
152	PL_003466-003469	APF Loan Increase Loan Docs Apr 2014 – Loan		X

		Modification Agreement		
153	PL_003470-003502	APF Loan Increase Loan Docs Apr 2014 – Mortgage Assignment of Rents and Leases, Security Agreement and Fixture Filings		X
154	PL_003503-003504	APF Loan Increase Loan Docs Apr 2014 – No Change Survey Affidavit for Owner		X
155	PL_003505	APF Loan Increase Loan Docs Apr 2014 – Owner Affidavit title company form		X
156	PL_003506-003512	APF Loan Increase Loan Docs Apr 2014 – Promissory Note		X
157	PL_003513-003515	APF Loan Increase Loan Docs Apr 2014 - SC Borrower Notice		X
158	PL_003516-003520	APF Loan Increase Loan Docs Apr 2014 - UCCI		X
159	PL_003521-003522	HVS Appraisal Apr 2014 – 3 year Pro Forma		X
160	PL_003539	HVS Appraisal Apr 2014 – 3 year Pro Forma		X
161	PL_003541	I-26 and Hwy. #302 Plan		X
162	PL_003542	Super 8 access change		X
163	PL_003543-003544	Super 8 Capital Budget and Total Cost		X
164	PL_003545-003546	Super 8 Capital Budget for Appraisal		X
165	PL_003548-003550	Deed for neighboring 1ac land sale		X
166	PL_003551	Survey for 650 Cherokee Lane		X
167	PL_003552-003560	Super 8 Market Location analysis		X
168	PL_003561-003576	Super 8 photographs		X
170	PL_003578-003584	Super 8 photographs		X
171	PL_003586	Super 8 summary of finishes		X
172	PL_003587-003589	Super 7 summary of finishes exceeding PIP		X
173	PL_003591-003598	Purchase Closing Statement		X
174	PL_003599	Lease trade rider		X
175	PL_003600-003601	Marquee sign variance		X
176	PL_003602	Prohibition against certain advertising rider		X
177	PL_003604-003652	Super 8 Franchise Agreement	X	
178	PL_003653-003661	Personal Financial Statement of Kaushal and Arunima Sinha, Dec 31, 2013		X
179	PL_003662	Personal Financial Statement of Kislaya Sinha, Dec 31, 2013		X
180	PL_003663-003718	Updated Personal Financial Statement of Kaushal and Arunima Sinha, as of Dec 31, 2013		X
181	PL_003720-003723	Updated Personal Financial Statement of Kislaya Sinha, as of Dec 31, 2013		X
182	PL_003725	Drawings of Permitting, Jun 7, 2013		X
183	PL_003729	Voicemail from Jonny Hoy Dec 10, 2012		X
184	PL_003730	Super 8 Commitment Fee wire instructions	X	
185	PL_003732	Video re: Inspector Melton Closing Property, Jun 14, 2013		X
186	PL_003733-003747	Cambridge Repair Sub Contractors, Nov 21,		X

		2011 to Nov 21, 2012		
187	PL_003749-003754	Hotel guest list for night of the fire and guest address information	X	
188	PL_003755-003762	Jones damage and renovation notes and emails between Jones and Sinha, May 19, 2014	X	
189	PL_003763-003770	Receipts for Cambridge Fire	X	
190	PL_003771-003830	Communications between Plaintiffs and Super 8 or Wyndham re: conversion of the Cambridge Hotel to a Super 8 facility		X
191	PL_003837-003838	Email between Bland and Sinha, May 9, 2014 re: FF&E Order		X
192	PL_003839-003843	Email from Bland to Sinha, May 14, 2014 re: Last of Big 3 vendor FF&E		X
193	PL_003844	Email between Michelle and Sinha re: A little more FF&E, May 14, 2014		X
194	PL_003852	Email from Watson to Wilson, Jun 20, 2103 re: fire damage ff&e inventory	X	
195	PL_003853	Email from Wilson to Poole, Jun 28, 2013 re: Cambridge Plaza Damage		X
196	PL_003854-003858	Email from Poole to Wilson, Jul 5, 2013 re: Contents-Inventory	X	
197	PL_003860-003861	Email between Wilson and Simoneaux, Sep 6, 2013 re: Conference Call		X
198	PL_003862-003864	Email between Simoneaux, Sinha and Harpootlian Employee, Sep 11, 2013 <b>Redacted</b>		X
199	PL_003865	Email between Wilson and Shah, Oct 23, 2013 re: Insurance		X
200	PL_003890-003897	Email from Bland to Jones with PDA, May 16, 2014 re: Super 8 – Columbia, SC – PIP requirements and brand standards		X
201	PL_003920-003921	Email between Bland and Jones and Lane with PDA, Apr 28, 2014 re: Elevator rehab consultation		X
202	PL_003935	Email from Bland to Lane and Jones with PDA, May 5, 2014 re: Elevator meeting		X
203	PL_003947-003949	Email from Bland to Lloyd, May 14, 2014 re: Super 8 remodel – Fire equipment upgrade		X
204	PL_003953-004069	Phase I Environmental Site Assessment prepared by HS Environmental Services, Inc., Jul 22, 2013		X
205	PL_004070-004126	Property Condition Assessment prepared by Envision PCA Solutions, Nov 1, 2011		X
206	PL_004325-004332	Information provided to law enforcement Keller with SLED re: Guest information		X
207	PL-004333-004342	Documents relating to the improvement,		X

		renovation or repairs of the Cambridge Plaza Hotel during the period of November 21, 2011 to March 29, 2013, including Sherwin-Williams invoices, list of rooms for renovation, and invoice from Columbia Fire & Safety		
208	PL_004343-004346	Documents relating to the structural engineering investigation and testing if of the concrete and roof deck; Brian Carpenter and Joe Schold		X
209	PL_004807-004812	Furniture receipts from SREE hotels for furniture purchased by Cambridge from Jan 2013 through the time of loss		X
210	PL_004813	Donated furniture email		X
211	PL_004813-004964	Cambridge employee time sheets and payroll records		X
212	PL-005029-005032	Receipts reflecting guests who stayed at the Cambridge Plaza hotel from Jan 2013 through the time of the loss		X
213	PL_005220-005224	Sinha additional information to Tesh Patel for the redevelopment		X
214	PL_005226-005241	Executed Credit Application, May 8, 2013		X
215	PL_05244-005254	Email from Patel, May 10, 2013 re: First proposal		X
216	PL_005255-005256	Email from Patel, May 24, 2013 re: Revised proposal		X
217	PL_005258-002561	Email from Tesh Patel, May 28, 2013 re: Revised proposal		X
218	PL_005262	Email between Sinha and APF, Jun 6, 2013 re: Clarification on scope of work		X
219	PL_005271-005272	Sinha cell phone records	X	
220	PL_002573-005275	Sinha resident alarm records	X	
221	PL_005276	Sinha resident alarm notification record	X	
222	PL_Sonitrol_000001-000063	Sonitrol records for the Cambridge Plaza Hotel	X	
223	PL_Stanley_Steamer 000001-000076	Stanley Steamer records for Cambridge Plaza Hotel	X	
224	PL_SLED_000001-000964	South Carolina Law Enforcement investigative file	X	
225	PL_LC 911 Comm_000001-000006	911 Event report for fire at the Cambridge Plaza Hotel on Jun 14, 2013	X	
226	PL_Lex Fire Serv_00001-000007	Lexington County Fire Service report	X	
227	PL_JAG_000001-000008	Information from JAG Insurance pursuant to subpoena issued by Plaintiffs	X	
228	PL_T-Mobile_000100-000107	Sinha cell phone records from T-Mobile	X	

229	PL_005278-005368	2014 Tax returns for Vagish, LLC	X	
230	PL-005369-005379	P&L Sheets Nov 2013 – Jul 2015	X	
231	PL_005380	Business Income Claim Workbook (native form)	X	
232	PL_005381-005387	Accountant Professional Fees	X	
233	PL_005388-005406	Email string between Stan Sanders and Kislaya Sinha, Mar 25, 2013 re: extension request	X	
234	PL_005407	Updated Business Income Claim Workbook (native form)	X	
235	PL_005408	Vagish ongoing bills (prepared by Sinha)	X	
236	PL_005409	Supplemental Business Income Claim Workbook (native form)	X	
237	PL_005410-005412	Building Repairs and Maintenance Activity Jul 1, 2013 through Aug 31, 2015 used by Phil Simoneaux in Business Income Claim	X	
238	PL_SLED_000965	Supplemental documents from the South Carolina Law Enforcement Division re: Video of security camera from Cambridge Plaza Hotel	X	
239	PL_SLED_005413-005747	Supplemental documents from the South Carolina Law Enforcement Division re: photographs	X	
240	PL_Sonitrol 000001-000009	Sinha contract file from Sonitrol	X	
241	Seneca 00001-00131	Seneca Commercial Property Policy, SSP1503130	X	
242	Seneca 00132-00136	Notice of loss email chain from Sinha, Jun 15, 2013	X	
243	Seneca 00138-00236	Cunningham Lindsey Property Report		
244	Seneca 00237-00238	Ltr from Sollicito to Vagish, Jul 16, 2013 re: Reservation of rights	X	
245	Seneca 00239	Ltr from RAH to Townsend re: submission of claim 7-29-13	X	
246	Seneca 00240	Ltr from Harpootlian to Ouzts, Aug 1, 2013 re: Representation	X	
247	Seneca 00241-00244	Ltr from Ouzts to Harpootlian, Aug 1, 2013 re: Blank proof of loss	X	
248	Seneca 00245-00325	Cunningham Lindsey 2 <sup>nd</sup> Property Report, Aug 14, 2013	X	
249	Seneca 00326-00328	Ltr from Harpootlian to Ouzts, Aug 15, 2013 re: Proof of loss form	X	
250	Seneca 00329-00492	JS Held Estimate for Cambridge Plaza Hotel, entered Jun 15, 2013	X	
251	Seneca 00493-00494	JS Held ltr To Townsend, Aug 30, 2013 re: Final report	X	
252	Seneca 00495-00498	Ltr from Ouzts to Harpootlian, Sep 12, 2013 re: Receipt of claim & Seneca's reservation of rights	X	

253	Seneca 00499-00500	Ltr from Harpootlian to Ouzts, Sep 13, 2013 re: claim documents	X	
254	Seneca 00501-00502	Ltr from Ouzts to RAH. Sep 18, 2013 re: additional claim documents	X	
255	Seneca 00503-00504	Vagish Business Income claim, Sep 18, 2013	X	
256	Seneca 00505-00651	Harpootlian ltr to Ouzts, Sep 26, 2013 re: POL Business Income and additional claim documents	X	
257	Seneca 00928-00933	Palmetto Design Capital Budget, Jun 23, 2013	X	
258	Seneca 01176	Legends Free Times Standard Ad		
259	Seneca 01237	Vagish Insurance Summary	X	
260	Seneca 01238-01239	Harpootlian ltr to Ouzts re: Sinha EUO	X	
261	Seneca 01240	Ouzts ltr to Harpootlian, Oct 16, 2013 re: Sinha EUO	X	
262	Seneca 01241-01407	Cunningham Lindsey 3 <sup>rd</sup> Report, Oct 22, 2103	X	
263	Seneca 01408-01710	Examination Under Oath of Kislaya Sinha, Oct 22, 2013	X	
264	Seneca 01711-01716	Harpootlian ltr to Ouzts, Nov 12, 2013 re: Referring Ouzts to Vagish CPA & Third Party Agreement	X	
265	Seneca 01767-01805	Palmetto Design Associates Bids	X	
266	Seneca 01806-01807	Closing letter loan, Jun 27, 2013		X
267	Seneca 01808	Access Point Financial Authorization Agreement for Direct Payment form (blank)		X
268	Seneca 01809-01810	Certificates of Insurance, Jun 27, 2013 and Apr 1, 2013	X	
269	Seneca 01836-01840	FF&E Guaranty Agreement	X	
270	Seneca 01878-01881	AFP Acknowledging Fire Damage and Requesting Docs, Jun 19, 2013		X
271	Seneca 01882-01885	Email AFP Acknowledging Fire Damage and Requesting Docs, Jun 19, 2013		X
272	Seneca 01886-01887	Email from Super 8 Acknowledging Fire Damage, Jun 19, 2015	X	
273	Seneca 01910-01921	Pay record for remediation work and First draw	X	
274	Seneca 01922-01925	Employee Earnings Summary Vagish, 2013		
275	Seneca 01933-01943	Cunningham Lindsey 4 <sup>th</sup> Report, Nov 14, 2013	X	
276	Seneca A 001933-002114	Seneca's Claim File	X	
277	Seneca 01945-01948	Cunningham Lindsey 5th report, Nov 22, 2103	X	
278	Seneca 01949-01951	Cunningham Lindsey 6th report, Dec 8, 2013	X	
279	Seneca 01952-01961	GGM Accounting Associate's report, Dec 20, 2013	X	
280	Seneca 01962	Email from Sollecito to Townsend re: ROR letter, Jul 16, 2013	X	
281	Seneca 01963-01965	Ltr from Ouzts to SLED, Jul 16, 2013 re:	X	



		SLED's request for policy information		
282	Seneca 01966	Email from Donahue, July 19, 2013 re: application		X
283	Seneca 01967	Email from Sollecito, Jul 19, 2013 re: To do list		X
284	Seneca 01968-01969	Email from Mastrocinque to Sinha, Jul 24, 2013 re: requesting additional docs		X
285	Seneca 01970	Email from Simoneaux to Mastrocinque, Jul 24, 2013 re: information		X
286	Seneca 01971-01972	Email from Ouzts to Harpootlian, Aug 1, 2013 re: proof of loss form		X
287	Seneca 01973-01974	Email from Townsend to Sollecito, Aug 19, 2013 re: Testing of fire debris		X
288	Seneca 01975-01990	Emails between Sollecito, Townsend and Schneider, Oct 2013		X
289	Seneca 01991-01995	Emails between Mastrocinque and Simoneaux, Nov 2013 re: POL claim documents		X
290	Seneca 01996-01998	Emails between Rimkus and Sollecito, Nov 18, 2013		X
291	Seneca 02001	Email from Harpootlian to Ouzts, Nov 25, 2013 re: Complaint		X
292	Seneca 02002-02078	Emails between Simoneaux to Mastrocinque, Nov 25, 2013 re: POL claim documents		X
293	Seneca 02079-02080	Ltr from Ouzts to Keller, Dec 20, 2013	X	
294	Seneca 02081	Cunningham and Lindsey acknowledgement of property assignment after lawsuit initiated, Dec 30, 2013		X
295	Seneca 02082-02083	Email from Sollecito to Townsend, Dec 30, 2013		X
296	Seneca 2426-2427	Email from Kislaya Sinha to Joie Jackson, Dec 23, 2014 re: resignation of Joie Jackson		X
297	Seneca 2487-2498	Communications with Lynn Eaton with Envision PCA Solutions		X
298	Seneca 2534-2816	Documents produced pursuant to a subpoena issued to Wyndham by Seneca		X
299	Seneca 2817-2877	Documents pursuant to a subpoena issued by to Sonitrol by Seneca		X
300	Seneca 2878-2882	Documents pursuant to a subpoena issued to Associated Distributing by Seneca		X
301	Seneca 2898-3153	Ltr from Ouzts to Keller, Jul 16, 2013 re: Response to SLED's Jun 26, 2013 ltr	X	
302	Seneca 3164-3166	FF&E inventory list	X	
303	Seneca 3335-3337	Invoice from JS Held for services rendered to Seneca		X
304	Seneca 3357-3366	Richard Mastrocinque report, Dec 20, 2013		X
305	Seneca 3367-3370	Rimkus invoice for services to Cunningham Lindsey and rate sheet		X

306	Seneca 3379-3388	Rimkus report, Jul 18, 2013		X
307	Seneca 3391-3395	Peter Hildebrand rates		X
308	Seneca 3396	List of materials reviewed by Peter Hildebrand		X
309	Seneca 3397-3455	Gene Pool report		X
310	Seneca 3456-3463	Peter Hildebrand expert witness case listing		X
311	Seneca 3464-3468	Peter Hildebrand timeline		X
312	Seneca 3469-3488	Peter Hildebrand white paper		X
313	Seneca 3489-3517	Peter Hildebrand report		X
314	Seneca 3518-3764	Seneca Claim file <b>Redactions</b>	X	
315	Seneca 3765-3774	CGM Accounting report, Dec 20, 2013		X
316	Seneca 3775	Clerical Request form		X
317	Seneca 3776	Large Loss Summary report, Jul 12, 2013		X
318	Seneca 3779-37782	Email between McGowan, Townsend and Sollecito re: McGowan's departure, Jun 27, 2013		X
319	Seneca 3784	Notice of Non-Renewal by Seneca	X	
320	Seneca 3786	Property Claim payment history		X
321	Seneca 3787-3835	H&S Loss Control Inspections report, Dec 13, 2012		X
322	Seneca 3836-3837	Commercial Building Valuation Report, Dec 31, 2012		X
323	Seneca 3838-3882	Seneca Claim Reserve Reviews and Claim Payment information		X
324	Seneca 3883-3884	Seneca Case Checklist tab		X
325	Seneca 3885	Seneca Claims Procedures		X
326	CL 00001-00764	All documents issued by Cunningham Lindsey pursuant to a subpoena issued by Plaintiffs		X
327	Callhan Salvage & Appraisal 00001-00110	All documents issued by Callhan Salvage & Appraisal pursuant to a subpoena issued by Plaintiffs		X
328	CGM Accounting	All documents and emails produced by CGM Accounting pursuant to a subpoena issued by Plaintiffs		X
329	JS Held	All documents produced by JS Held contained in folders "Emails, Insurer and Policyholder" pursuant to a subpoena issued by Plaintiffs		X
330	Rimkus 0001-0390	All documents produced by Rimkus pursuant to a subpoena issued by Plaintiffs		X
330	Seneca 3885-3900	Seneca Claims Procedures document, Jun 14, 2014		X
331	Seneca 4729	Appraisal Award, Jan 8, 2015		X
332	Seneca 4730-4749	Seneca Reserve and Payment information for claim #13FFN155		X
333	Seneca 4834	Liability Auto and Property Claim hierarchy chart		X



334	No Bates number	Excel chart re: Insurance Department claim log for Seneca		X
335	Seneca 4835-4850	Stephen Sollicito personnel file from Seneca		X
336	PDA 01-2246	Documents produced by Palmetto Design Associates pursuant to a subpoena issued by Plaintiffs		X

Plaintiffs reserve the right to use any documents identified by Defendant or for impeach or rebuttal purposes. Further, Plaintiffs reserve the right to amend these pretrial disclosures, if necessary.

Respectfully submitted,

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